

EXHIBIT 2

Exhibit 2

Summary Chart of the OpenAI RFPs at Issue & Discovery The Times Agreed to Produce

| OpenAI Discovery Requests at Issue | Discovery The Times Agreed to Produce |
|---|---|
| <p>The Times's Use of GenAI</p> <p>OAI RFP 44: Documents sufficient to show Your policies and procedures regarding the use of Generative AI by Your Employees.</p> <p>OAI RFP 45: All Documents and Communications relating to Your potential adoption of Generative AI for use by Employees of The New York Times Company, including Communications with any Generative AI company regarding that potential adoption.</p> <p>OAI RFP 46: Documents sufficient to show any training programs You plan to implement or have implemented regarding Generative AI at The New York Times Company.</p> <p>OAI RFP 49: Documents sufficient to show any past and present efforts or future plans to utilize Generative AI in Your reporting and presentation of content, including but not limited to print articles, online articles, blog posts, videos, and graphics.</p> | <p>The Times agreed to produce:</p> <ol style="list-style-type: none"> 1) Documents regarding The Times's A.I. Initiatives program, 2) Documents sufficient to show The Times's past, present, and future efforts to use generative AI in the reporting or presentation of content, 3) Documents sufficient to show any training programs The Times is implementing or has implemented about generative AI, 4) Documents regarding The Times's policies and procedures regarding the use of Defendants' generative AI tools, and 5) Documents regarding Defendants' generative AI tools that The Times uses in its reporting or presentation of content. |
| <p>The Times's Creation of AI or GenAI Tools</p> <p>OAI RFP 50: All Documents and Communications relating to the training of Your artificial intelligence satellite images tool referenced in the February 19, 2024 Reuters Institute article, "New York Times publisher A. G. Sulzberger: 'Our industry needs to think bigger'" including without limitation any base models and training data You used.</p> <p>OAI RFP 51: All Documents and Communications relating to the training of Your artificial intelligence tool referenced in the February 20, 2024 Axios article, "Exclusive: NYT plans to debut new generative AI ad tool later this year" including without limitation any base models and training materials You used.</p> | <p>The Times agreed to produce:</p> <ol style="list-style-type: none"> 1) Documents regarding The Times's A.I. Initiatives program. |

| OpenAI Discovery Requests at Issue | Discovery The Times Agreed to Produce |
|--|--|
| The Times's Positions Regarding AI or GenAI | |
| <p>OAI RFP 4: All Documents and Communications relating to the alleged reproduction, public display, or distribution of Your Asserted Works via Generative AI services other than GPT Services.</p> <p>OAI RFP 5: All Documents and Communications relating to any attempt by You, including failed attempts, to reproduce any of Your Published Works via Generative AI services other than GPT Services.</p> <p>OAI RFP 6: All Documents and Communications relating to any outputs of via Generative AI services other than GPT Services that allegedly summarize, quote, or otherwise reference Your Asserted Works.</p> <p>OAI RFP 16: All Documents and Communications relating to Your knowledge of the alleged use of Your Published Works for training Generative AI models.</p> <p>OAI RFP 24: All Documents and Communications between You and other news, media, or writers' organizations and publishers, as well as any other named plaintiff in Tremblay v. OpenAI, Inc., No. 3:23-cv-03223 and Silverman v. OpenAI, Inc., No. 3:23-cv-03416 in the Northern District of California, and Authors Guild v. OpenAI Inc., No. 1:23-cv-08292, Alter v. OpenAI Inc., No. 1:23-cv-10211, Basbanes v. Microsoft, No. 1:24-cv-00084, The Intercept Media, Inc. v. OpenAI, Inc., No. 1:24-cv-01515, and Raw Story Media, Inc. v. OpenAI, Inc., No. 1:24-cv-01514 in the Southern District of New York, directly or through any Employee, Agent, or third party, related to copyright and artificial intelligence.</p> | <p>The Times agreed to produce:</p> <ol style="list-style-type: none"> (1) Communications with third parties regarding the use of Times content in Defendants' generative AI products, (2) Communications with news, media, writers' organizations, and plaintiffs in related cases about this litigation, Defendants' use of Times content, or whether to license works to OpenAI, (3) Communications with government agencies regarding generative AI and this litigation, (4) Documents The Times has exchanged with any person concerning this litigation, (5) Documents regarding The Times's attempts to negotiate and license its works to OpenAI or Microsoft, (6) Documents regarding Defendants' use of Times works to train their models, and (7) Documents regarding OpenAI competing with The Times's published works or creating substitutive products. |